



Miedel & Mysliwiec LLP

July 11, 2023

VIA ECF

The Honorable Jennifer L. Rochon
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Bevelyn Williams, et al* 22 Cr. 684 (JLR)

Dear Judge Rochon:

I represent Edmee Chavannes in the above referenced matter and write jointly on behalf of both of the defendants to request that the Court's motion schedule be extended. The government, through AUSA Jamie Bagliebter, has indicated that it has no objection to this request. Trial in this case is scheduled for November 27, 2023, and substantive motions are due by July 17, 2023. *See* ECF #36. For the reasons set forth below, we respectfully request that substantive motions be filed on or before July 24, 2023; the government response filed by August 7, 2023; and defendants reply filed by August 14, 2023.

Based on the need for the continued review of discovery materials and additional conversations between the parties, on top of current time demands, both defense counsel respectfully request this additional time to meet the needs of our clients. Additionally, this added time would allow parties to further confer with the government regarding possible resolutions and any pre-trial disputes.

I have discussed this request with the counsel for co-defendant, Bevelyn Williams, and with counsel for the government, who have respectively joined and indicated no objection to the extension outlined in this letter. All defendants further consent to the exclusion of time pursuant to the Speedy Trial Act.

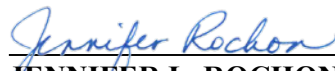
Thank you for the court's consideration.

Application GRANTED. Pretrial Motions shall be filed no later than July 24, 2023. The Government's response shall be filed no later than August 7, 2023 and Defendants' replies shall be filed no later than August 14, 2023. Speedy Trial time remains excluded until November 14, 2023.

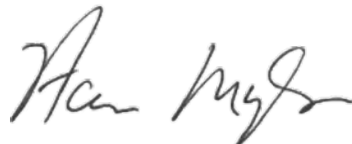
SO ORDERED.

Dated: July 12, 2023
New York, New York

cc: AUSA Jamie Bagliebter
via email


JENNIFER L. ROCHON
United States District Judge

Respectfully submitted,



Aaron Mysliwiec
Attorney for Edmee Chavannes